

1 Jahan C. Sagafi (SB# 224887)  
2 Rachel W. Dempsey (SB# 310424)  
3 Laura Iris Mattes (SB# 310594)  
4 OUTTEN & GOLDEN LLP  
5 One Embarcadero Center, 38th Floor  
6 San Francisco, CA 94111  
7 Telephone: (415) 638-8800  
8 Facsimile: (415) 638-8810  
9 E-mail: [jsagafi@outtengolden.com](mailto:jsagafi@outtengolden.com)  
10 E-mail: [rdempsey@outtengolden.com](mailto:rdempsey@outtengolden.com)  
11 E-mail : [imattes@outtengolden.com](mailto:imattes@outtengolden.com)

12 Adam T. Klein (admitted *pro hac vice*)  
13 Rachel M. Bien (SB# 315886)  
14 OUTTEN & GOLDEN LLP  
15 685 Third Avenue, 25th Floor  
16 New York, New York 10017  
17 Telephone: (212) 245-1000  
18 Facsimile: (646) 509-2060  
19 E-mail: [atk@outtengolden.com](mailto:atk@outtengolden.com)  
20 E-mail: [rmb@outtengolden.com](mailto:rmb@outtengolden.com)

21 *Attorneys for Plaintiffs and Proposed Class and*  
22 *Collective Members*

23 UNITED STATES DISTRICT COURT  
24 NORTHERN DISTRICT OF CALIFORNIA  
25 OAKLAND DIVISION

26 ROXANA DEL TORO LOPEZ and  
27 ANA MEDINA, on behalf of  
28 themselves, and all others similarly  
situated,

Plaintiffs,

v.

UBER TECHNOLOGIES, INC.,

Defendant.

Case No. 4:17-cv-06255-YGR

**DECLARATION OF COMPLIANCE  
WITH CALIFORNIA LABOR CODE  
PRIVATE ATTORNEYS GENERAL  
ACT OF 2004**

1 I, Jahan C. Sagafi, declare:

2 1. I am a member of the Bar of this Court and one of the attorneys representing  
3 Plaintiffs Roxana del Toro and Ana Medina in this action. I make this declaration to evidence  
4 Plaintiffs' compliance with the settlement submission requirements of the California Labor Code  
5 Private Attorneys General Act, Cal. Lab. Code § 2699(1)(2). I have personal knowledge of the  
6 facts set forth in this declaration and could and would competently testify to them under oath if  
7 called as a witness.

8 2. On March 26, 2018, Plaintiffs filed an unopposed Motion for Order Conditionally  
9 Certifying Settlement Class and Collective Action, and Granting Preliminary Approval ("Motion  
10 for Preliminary Approval") (ECF No. 33).

11 3. On March 26, 2018, I caused to be submitted to the California Labor and  
12 Workforce Development Agency ("LWDA") the parties' Settlement Agreement, including the  
13 class notice, claim form, envelope, proposed order, and operative complaint (ECF No. 33-2), via  
14 online transmission pursuant to California Labor Code sections 2699(1)(2) and 2699 (1)(4).  
15 Attached to this declaration as Exhibit 1 is a true and correct copy of Plaintiffs' submission to the  
16 LWDA.

17 4. After submitting the parties' Settlement Agreement, I received an e-mail from the  
18 LWDA acknowledging receipt of the submission. Attached to this declaration as Exhibit 2 is a  
19 true and correct copy of the e-mail from the LWDA.

20 5. On April 16, 2018, Plaintiffs filed a supplemental brief in support of their  
21 Motion for Preliminary Approval (ECF No. 45).

22 6. On April 16, 2018, I caused to be submitted to the LWDA the parties'  
23 Amended Settlement Agreement, including the revised class notice, revised claim form, envelope,  
24 revised proposed order, and operative complaint (ECF No. 45-2), via online transmission.  
25 Attached to this declaration as Exhibit 3 is a true and correct copy of Plaintiffs' second submission  
26 to the LWDA.

27 7. After submitting the parties' Amended Settlement Agreement, I received an e-  
28

1 mail from the LWDA acknowledging receipt of the submission. Attached to this declaration as  
2 Exhibit 4 is a true and correct copy of the e-mail from the LWDA.

3 \* \* \*

4 I declare, under penalty of perjury, under the laws of the State of California that the  
5 foregoing is true and correct. Executed this 17th day of April, 2018 at San Francisco, California.

6 /s/ Jahan C. Sagafi

7 Jahan C. Sagafi

8 Jahan C. Sagafi (SB# 224887)

9 [jsagafi@outtengolden.com](mailto:jsagafi@outtengolden.com)

10 OUTTEN & GOLDEN LLP

11 One Embarcadero Center, 38th Floor

12 San Francisco, CA 94111

13 Telephone: (415) 638-8800

14 Facsimile: (415) 638-8810